



LINDT & SPRÜNGLI UK LTD

UK Tax Strategy

This document is intended to comply with the reporting obligations of Schedule 19 of the Finance Act 2016 and has been approved by the board of Lindt & Sprüngli UK Ltd. It sets out the UK's approach to conducting its tax affairs and dealing with tax risks for the year ending 31st December 2018. It is reviewed annually, updated as appropriate and approved by the Board.

In line with Lindt & Sprüngli UK's strong sense of corporate citizenship and in line with the Group's code of conduct, the company is committed to:

- Ensure that all employees conduct business in full compliance of all applicable domestic and international laws and regulations relating to its tax activities.
- Maintaining an open and honest relationship with the tax authorities based on integrity and collaboration.
- Applying care in our management of all processes and procedures of all tax related activities which are undertaken, and ensuring that our tax governance is appropriate.

Risk management

Where appropriate, we look to engage with tax authorities to disclose and resolve issues, risks and uncertain tax positions. The subjective nature of many tax rules does however mean that it is often impossible to mitigate all known tax risks. Lindt & Sprüngli UK work closely with external tax consultants in managing the UK tax affairs.

The identified Tax Risks are then assessed on a case by case basis arriving at well-reasoned conclusions on how each individual Risk should be managed.

The level of risk which Lindt & Sprüngli UK accepts in relation to UK taxation is consistent with its overall objective of achieving certainty in the firm's tax affairs. At all times Lindt & Sprüngli UK seeks to comply fully with its regulatory and other obligations and to act in a way which upholds its reputation as a responsible corporate citizen.

Lindt's global tax function is part of the central finance function that reports to the Group CFO. The Head of The Group Finance Team leads a small group of finance professionals with the appropriate professional qualifications. Lindt are committed to providing team members with the relevant training required to carry out their roles to achieve both their personal and professional objectives. All members of the Finance team seek to operate in line with the Tax Strategy.

Tax planning

Lindt & Sprungli UK will not engage in artificial transactions the sole purpose of which is to reduce UK tax. However, Lindt & Sprungli UK will consider undertaking a transaction in a way that gives rise to UK tax efficiencies providing it is aligned with its commercial objectives and complies with the associated UK tax legislation. Lindt & Sprungli UK will not engage in tax efficiencies if the arrangements impact upon Lindt & Sprungli UK's reputation, brand, corporate and social responsibilities, or future working relationships with HMRC.

Tax advice is sought from external advisors in respect of material transactions when the Finance department do not have the expertise in a particular area. The UK C.F.O liaises with the central function for the appointment of external advisors where necessary.

Approach towards dealings with HMRC

Lindt & Sprungli UK is committed to the principles of openness and transparency in its approach to dealing with HMRC, and in particular it commits to:

- Make fair, accurate and timely disclosure in correspondence and returns, and respond to queries and information requests in a timely fashion and ensure all interactions with HMRC are conducted in an open, collaborative and professional manner.
- Seek to resolve issues with HMRC in a timely manner, and where disagreements arise work with HMRC to resolve issues by agreement where possible.
- Ensure that transactions are structured to give a tax result which is not inconsistent with the economic consequences (unless specific legislation anticipates that result), nor contrary to the intentions of Parliament.
- Interpret the relevant laws in a reasonable way, and ensure transactions are structured consistently.
- Be open and transparent about decision-making, governance and tax planning.

Approval

This statement was approved by the Board of Directors on December 12, 2018.

Name (director): Dr. Dieter Weisskopf

Signature:

